

Part 1

Municipal Sanitary Authority of New Kensington Pretreatment Annual Report for Reporting Year 2018



Ms. Margaret Green
Office of Municipal Assistance (3WP24)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

MAR 20 2019

**Municipal Sanitary Authority of New Kensington
Pretreatment Annual Report for Reporting Year 2018**

Our Reference
351383

Two Allegheny Center
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March 19, 2019

Dear Ms. Green:

On behalf of the Municipal Sanitary Authority of the City of New Kensington, please find enclosed one (1) copy of the Pretreatment Annual Report for Reporting Year 2018.

If you have any questions regarding these matters, please contact me.


Linda French
Project Scientist
T 412.497.2912
Linda.French@mottmac.com
/lf
cc: Joe Ditty (MSANK)



**Municipal Sanitary Authority of
The City of New Kensington**
Westmoreland County, Pennsylvania

**Pretreatment Annual Report
for Reporting Year 2018**

March 2019

Submitting Office:

**Mott MacDonald
Two Allegheny Center
Nova Tower 2, Suite 802
Pittsburgh, PA 15212
T 412.497.2900 F 412.497.2901**

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MAR 20 2019

PRETREATMENT PERFORMANCE SUMMARY

I. General Information

Control Authority:	Municipal Sanitary Authority of the City of New Kensington	
Address:	120 Logans Ferry Road	
City: New Kensington	State: PA	Zip+4: 15068-2046
Contact Person/Title:	Joseph Ditty	
Title:	Pretreatment Coordinator	
Telephone Number:	(724) 335-9813	
E-mail address:	jditty@msank.org	
NPDES Permit No.:	PA0027111	
Permit Issuance Date:	July 1, 2017	Expiration Date: June 30, 2022
Reporting Period:	October 1, 2017 through December 31, 2018	
Total Categorical SIUs:		1
Total "Middle Tier" CIUs (MTCIUs):		0/0
Total Nonsignificant CIUs (NSCIUs):		0/0
Total Significant Non-Categorical IUs (SNIUs):		4

II. Compliance Monitoring Program

1. No. of SIUs with Current Control Documents	5
2. No. of SIU Facilities Inspected	5
3. No. of SIU Facilities Sampled	5
4. No. of SIUs Submitting Self-Monitoring Reports	5

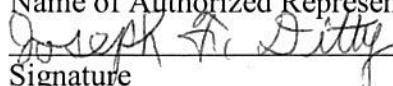
III. Significant Industrial User Compliance

1. No. of SIUs Violating a Compliance Schedule/No. On a Schedule	0/0
2. No. of SIUs in SNC for the July to December 2018 Period	2
3. No. of SIUs in SNC at Any Time during Calendar Year	2
4. No. of SIUs in SNC That Were Also in SNC during the Previous Calendar Year	1
5. No. of NSCIUs that violated any standards or requirements	0

IV. Enforcement Actions

1. Notices / Letters of Violation Issued to SIUs	17
2. Enforceable Compliance Schedules Issued to SIUs	0
3. Civil/Criminal Suits Filed:	0/0
4. No. of SIUs from which Penalties have been Collected	1
5. Other Actions (sewer bans, etc.)	0

I certify that the information contained in this report and attachments is complete and accurate to the best of my knowledge.

Joseph F. Ditty
Name of Authorized Representative

Signature

Pretreatment Coordinator
Title
March 15, 2019
Date

Part A Pretreatment Program Performance

I. General Information

During 2018, the Municipal Sanitary Authority of the City of New Kensington (MSANK) continued implementation of its Industrial Pretreatment Program. A total of one hundred and fifty eight (158) dischargers were permitted under the pretreatment program in 2018, as compared to one hundred and fifty nine (159) in 2017. During 2018, one (1) nonsignificant business closed. The significant industrial dischargers regulated under pretreatment permits are included in *Attachment 1*.

A. Total of Categorical Significant Industrial Users

There was one (1) categorical SIU permitted under the Pretreatment Program during 2018. The categorical SIU was Keystone Rustproofing. Keystone Rustproofing is regulated under the EPA Categorical Limits Combined Wastestream Formula [40CFR, Part 433.24(c) Electroplating and 40 CFR 433.17(a) Metal Finishing].

The address for this facility is as follow:

Keystone Rustproofing, Inc.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

During 2018, there were no SIUs subject to the Transportation Equipment Cleaning, Centralized Waste Treatment or Pharmaceutical Manufacturing standards.

During 2018, there were no facilities designated as “middle tier” categorical industrial users, or nonsignificant categorical industrial users.

B. Total of Non-categorical Significant Industrial Users

There were four (4) non-categorical SIUs permitted under the Pretreatment Program during 2018. These SIUs included AVH-Occupational Care Center, Smithfield (Farmland) Corporation, Schreiber Industrial Development Company, and Unifirst Corporation.

Addresses for these facilities are as follows:

1. AVH-Occupational Care Center
651 Fourth Avenue
New Kensington, PA 15068

2. Schreiber Industrial Development Company

P.O. Box 691

New Kensington, PA 15068

MSANK requests an updated listing of all companies located in the Schreiber Industrial District (SID) annually. I also checked their tenant listing at the SID board. The facilities for 2018 are as follows: Anford, Inc./Lloyd Snell (car wash detergent blending), APA Trucking (Repair Trailers), Gentile Manufacturing (dry storage); HABSCO (Office), Ken Clifton (motor home), Mineral Processing Specialties (metal recycling plant), Performance Spray (spray equipment), Shurina Brothers (Trucks), Siemens Westinghouse (warehouse), Smithfield Farmland (dry storage of spices), Specialty Alloy Processing Company (heat treated metal), United Energy (Masonry on steel rollers), and Vere, Inc. (optical). Premier Trucking (Office, Parking Lot) and American Felt (Industrial Felt Products) are new for 2018.

3. Smithfield (Farmland) Corporation

2200 Rivers Edge Drive

Arnold, PA 15068

4. Unifirst Corporation

1150 Second Avenue

New Kensington, PA 15068

C. Total of Non-Significant Industrial Users

There were a total of one hundred and fifty three (153) nonsignificant industrial users permitted under the industrial pretreatment program by the end of 2018. During 2018, one (1) nonsignificant business closed, which was Main Street Deli.

II. Compliance Status of Significant Industrial Users

MSANK requires all regulated significant industrial users to conduct self-monitoring of wastewater discharges. A summary of the monitoring requirements for the significant industrial users regulated under Pretreatment Permits is included in **Attachment 2**. This summary lists the name, classification, average daily flow, annual number and type of required monitoring events, monitoring event dates and required analytical parameters for significant industrial users. MSANK issues all pretreatment permits on an annual basis. All pretreatment permits issued by MSANK in 2018 were effective on January 1, 2018 and expired on December 31, 2018.

A. Number of SIUs required to submit Baseline Monitoring Reports

No SIUs were requested to submit Baseline Monitoring Reports during 2018.

B. Number of SIUs required to submit 90-Day Compliance Reports

During 2018, no SIUs were required to submit 90-day compliance reports.

C. Number of SIUs required to submit Self-Monitoring Compliance Reports

All categorical and significant non-categorical users are required to conduct self-monitoring. MSANK does not sample for any facility in lieu of self-monitoring.

There were a total of five (5) SIUs required to submit self-monitoring reports during 2018. The status of the self-monitoring report submissions by each SIU is described as follows.

1. AVH-OCC

Four self-monitoring reports were required to be submitted during 2018. Four self-monitoring reports were submitted in accordance with requirements.

2. Keystone Rustproofing, Inc.

Six self-monitoring reports were required to be submitted during 2018.
Six self-monitoring reports were submitted in accordance with requirements.

3. Schreiber Industrial Development Co.

Four self-monitoring reports were required to be submitted during 2018.
Two self-monitoring report were submitted in accordance with requirements.
One self-monitoring report was submitted seventy nine (79) days late with all results in compliance with permit limits, but without signed documentation.
One self-monitoring report was submitted fourteen (14) days late with all results in compliance with permit limits, but without signed documentation.

4. Smithfield Farmland (Farmland Foods) Corporation

Twelve self-monitoring reports were required to be submitted during 2018.
Twelve self- monitoring reports were submitted in accordance with requirements.

5. Unifirst Corporation

Twelve self-monitoring reports were required to be submitted during 2018.
Twelve self-monitoring reports were submitted in accordance with requirements.

D. Number of SIUs placed on a Compliance Schedule

No SIUs were placed on a compliance schedule during 2018.

E. Number of SIUs in Significant Noncompliance status during 2018

There were two (2) SIUs in Significant Noncompliance status during 2018. The Significant Noncompliance Newspaper Notice is included in *Attachment 3*.

III. Compliance Monitoring Program

All industries discharging wastewater into the MSANK sewerage system must comply with the terms and conditions of the Industrial Pretreatment Ordinance, Industrial Pretreatment Permit and the Rules and Regulations Governing Sewage Services. All industrial wastewater dischargers are required to conduct wastewater self-monitoring procedures.

MSANK continues to track industrial user compliance using a Testing and Inspection Summary. The reports indicate the name of the industrial user, classification, permit number, required monitoring frequency and dates of each sampling and/or inspection conducted by the user and MSANK at the facility throughout the year. The Testing and Inspection Summaries for 2018 are included in *Attachment 4*.

A. Number of Control Documents issued during the reporting period

Pretreatment Permits were issued to five (5) SIUs and one hundred and fifty four (153) non-significant industrial users during 2018.

B. Number of facilities inspected during the reporting period

During 2018, MSANK inspected each SIU facility permitted under the pretreatment program. The SIU facilities and the dates that MSANK inspected the facilities are as follows:

<u>Significant Industrial User</u>	<u>Date of MSANK Inspection</u>
1. AVH – OCC	December 18, 2018
2. Keystone Rustproofing, Inc.	November 30, 2018
3. Schreiber Industrial Development Co.	December 6, 2018 (Annford)
4. Smithfield (Farmland) Corp.	December 18, 2018
5. Unifirst Corporation	December 18, 2018

C. Number of facilities sampled during the reporting period

MSANK conducted an “announced” sampling for all facilities and an “unannounced” sampling at all facilities in 2018. During both the “announced” and “unannounced”

sampling, a 24-hr. composite sample was collected by MSANK. The dates that MSANK conducted sampling of the SIU facilities during 2018 are as follows:

<u>Significant Industrial User</u>	<u>MSANK Unscheduled/Scheduled Sampling Events</u>
1. AVH-OCC	November 27-28, 2018/December 19-20, 2018
2. Keystone Rustproofing, Inc.	January 9-10, 2018/March 26-27, 2018, May 30-31, 2018, July 30-31, 2018, September 20-21, 2018, November 29-30, 2018
3. Schreiber Industrial Dev. Co.	December 10-11, 2018/December 19-20, 2018
4. Smithfield (Farmland)	September 25-26, 2018/December 12-13, 2018
5. Unifirst Corporation	June 25-26, 2018/December 12-13, 2018

IV. Compliance Enforcement Program

MSANK has developed a Self-Monitoring Report Review Summary to enable the compliance status of each SIU to be tracked throughout the year. A copy of the 2018 SIU Self-Monitoring Report Review Summary is included in **Attachment 6**. This status report indicates whether self-monitoring reports have been submitted by the SIU and the MSANK review status of the report including whether the report was late or if Significant Noncompliance status applies to the facility. Use of this tracking mechanism is intended to enable Notices of Violation to be issued in a timely manner.

A. Number of Notices / Letters of Violation issued to SIUs

MSANK issued a total of seventeen (17) Notices (Letters) of Violation for pretreatment violations during 2018. Copies of Notices of Violation, Penalty Notification Letters, and Enforcement Action Reports/Letters are in **Attachment 5**. A breakdown of the notices / letters issued by MSANK to the SIUs applicable to 2018 is as follows:

<u>Significant Industrial User</u>	<u>Number of Notices of Violation Letters Issued by MSANK Applicable to 2018</u>
1. AVH-OCC (Citizens)	0
2. Keystone Rustproofing	11
3. Schreiber Ind. Dev. Co.	3
4. Smithfield (Farmland)	0
5. Unifirst Corporation	3
Total	17

1. AVH - Occupational Care Center (Citizens Ambulatory Care Center): AVH – Occupational Care Center (AVH-OCC) was in compliance during 2018. MSANK sent the attached permit application letter on May 25, 2018. The returned permit application did not indicate a need to change AVH-OCC's 2018 Permit.

2. Keystone Rustproofing, Inc.: Keystone Rustproofing (Keystone) was in SNC during 2018. Keystone has filed an appeal of their Permit Limits, which is currently in litigation. MSANK and Keystone split sampling event on January 9-10, 2018 indicated Nickel, Zinc and Total Metals Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated March 7, 2018. MSANK issued the attached \$90,000.00 Penalty Notification letter for the August-November 2017 exceedences dated April 2, 2018. The Keystone sampling event on February 27-28, 2018 indicated Nickel and Total Cyanide Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated April 2, 2018. MSANK and Keystone split sampling event on March 26-27, 2018 indicated Nickel and Zinc Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated May 14, 2018. MSANK issued the attached \$12,000.00 Reduced Penalty Notification letter for the August-November 2017 exceedences dated May 24, 2018. MSANK sent the attached permit application letter on May 30, 2018. The returned permit application did not indicate a need to change Keystone's 2019 Permit Limits. The Keystone sampling event on April 26-27, 2018 indicated a Nickel Permit and TRC limit exceedence. MSANK issued the attached Notice of Violation dated June 11, 2018. MSANK issued the attached Penalty Assessment dated July 18, 2018. MSANK and Keystone split sampling event on May 30-31, 2018 indicated Copper, Nickel, Silver and Total Cyanide Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated July 26, 2018. Keystone issued the attached response letter dated August 23, 2018. MSANK sent the attached letter dated August 28, 2018 concerning the need to correct errors in the July 26, 2018 Notice of Violation and reissued the attached Notice of Violation dated August 28, 2018. MSANK issued the attached Penalty Assessment dated September 11, 2018. MSANK and Keystone split sampling event on July 30-31, 2018 indicated Copper and Nickel Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated October 19, 2018. The Keystone sampling event on August 30-31, 2018 indicated a Total Cyanide Permit and TRC limit exceedence. MSANK issued the attached Notice of Violation dated October 19, 2018. MSANK and Keystone split sampling event on September 20-21-10, 2018 indicated Copper, Nickel, Zinc, Total Cyanide and Total Metals Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated November 7, 2018. MSANK issued the attached \$46,000.00 Penalty Notification letter for the February-April, 2018 exceedences dated November 20, 2018. MSANK issued the attached \$72,000.00 Penalty Notification letter for the May-August, 2018 exceedences dated November 20, 2018. The Keystone sampling event on October 25-26, 2018 indicated Copper, Nickel and Total Cyanide Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated December 13, 2018. MSANK and Keystone split sampling event on November 29-30, 2018 indicated Nickel, Zinc and Total Cyanide Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated January 17, 2019. The Keystone sampling event on December 13-14, 2018 indicated a Nickel and Total Cyanide Permit and TRC limit exceedences. MSANK issued the attached Notice of Violation dated January 29, 2019. Keystone issued the attached response letter dated

March 5, 2019. The MSANK Enforcement Committee will be considering further action on these matters. Starting on February 5, 2019 MSANK has a lab sampling Keystone every day they operate for six months. This is an effort to determine if Keystone is coming into compliance and help them evaluate their methods.

3. Schreiber Industrial District: Schreiber Industrial District (Schreiber) was in non-compliance during 2018. Schreiber Industrial District was in the process of being sold to the New Kensington Redevelopment Authority in 2018. MSANK issued the attached letter to the City of New Kensington to recover outstanding Pretreatment fees dated May 10, 2018. MSANK sent the attached permit application letter on May 25, 2018. Schreiber had not returned the permit application due to the change of ownership. I met with representatives of Schreiber on July 17, 2018 to discuss the Permit responsibilities for the new ownership. MSANK determined on December 6th, 2018 that Schreiber had drained one of their pump stations the previous two days without notifying MSANK. MSANK issued the attached Notice of Violation dated December 10, 2018. The New Kensington Redevelopment Authority issued the attached response letter dated December 17, 2018. Schreiber was required to submit its third quarter sampling by October 28, 2018, but was not received until February 15, 2019 (79 days late). MSANK issued the attached Notice of Violation dated February 25, 2019. Schreiber was required to submit its fourth quarter sampling by January 28, 2019, but was not received until February 15, 2019 (14 days late). MSANK issued the attached Notice of Violation dated February 25, 2019. The MSANK Enforcement Committee will be considering further action on these matters.
4. Smithfield (Farmland Foods): Smithfield Corporation (Smithfield) was in compliance during 2018. MSANK sent the attached permit application letter on May 30, 2018. The returned permit application did not indicate a need to change Smithfield's 2019 Permit.
5. Unifirst Corporation: Unifirst Corporation (Unifirst) was in non-compliance during 2018. Unifirst's February Self-Monitoring Report indicated a CBOD exceedence. MSANK issued the attached Notice of Violation dated April 19, 2018. Unifirst sent the attached response letter dated May 21, 2018. MSANK sent the attached permit application letter on May 30, 2018. Unifirst's April Self-Monitoring Report indicated a CBOD exceedence. MSANK issued the attached Notice of Violation dated June 15, 2018. Unifirst's July Self-Monitoring Report indicated a CBOD exceedence. MSANK issued the attached Notice of Violation dated September 5, 2018. The returned permit application did not indicate a need to change Smithfield's 2019 Permit. MSANK issued the attached Penalty Assessment letter dated November 7, 2018. MSANK issued the attached \$5000.00 Penalty Notification letter dated November 20, 2018.

B. Number of Enforceable Compliance Schedules issued to SIUs

No compliance schedule was issued during 2018.

C. Number of Civil Suits Filed/Criminal Suits Filed

There were no civil suits filed during the reporting period.

There were no criminal suits filed during the reporting period.

D. Number and Amount of Penalties Assessed during the reporting period

A summary table of penalties MSANK issued to SIUs for the Reporting Year 2018 is as follows:

Industrial User	Date of Violation	Type of Violation	Amount of Penalty	Penalty Issued	Penalty Status
Keystone Rustproofing	12/6-7, 2016 through June 30, 2017	(2) Zinc (SNC) (3) Nickel (SNC) (2) Copper (2) Total Metals (1 SNC)	\$84,000.00	9/18/2017	\$37,000.00 Settlement paid in 2018.
Keystone Rustproofing	8/31/2017 9/7-8, 2017 10/18-19/2017 11/7-8,17-18/2017	Nickel, T.CN CN, NI, ZN, T.Metals CU, NI, T. Metals NI, ZN, Total CN	\$90,000.00	3/19/2018	5/21/2018 Settlement of \$12,000 is being paid Monthly.
Keystone Rustproofing	2/27-28/2018 3/26-27, 2018 3/1-31/2018 4/26-27/2018	Nickel, T. CN (SNC) NI (SNC), ZN ZN NI (SNC)	\$46,000.00	11/19/2018	In Litigation
Keystone Rustproofing	5/30-31/2018 5/1-31, 2018 7/30-31/2018 7/1-31/2018 8/30-31/2018	CU, NI, T. CN(SNC) T. CN (SNC) CU, NI (SNC) CU (SNC) T. CN (SNC)	\$72,000.00	11/19/2018	In Litigation
Unifirst Corporation	7/10-11/2018	CBOD	\$5,000.00	11/19/2018	Pending

Part B-Pretreatment Program Developments

1. Summary of POTW Operations

During 2018, there were no interference or pass through at the MSANK sewage treatment plant that were attributable to industrial discharges. Upset conditions were not prevalent during the year. The MSANK sewage treatment plant effluent achieved compliance with the parameters in their NPDES permit. The Sludge data for Local Limits indicated the nickel and zinc concentrations exceeded the EPA limits for land application and the sludge is hauled to an approved Landfill.

The summary of Influent, Effluent and Sludge analytical data for the 2018 reporting year is included in **Attachment 7**. The Total Toxic Pollutants for the sludge and the influent were unfortunately not tested and an extra sampling will be done in March and provided.

2. Changes from the 2017 Pretreatment Annual Report

No changes in staffing or funding have occurred since submittal of the Pretreatment Annual Report for 2017.

3. Miscellaneous Developments

MSANK's Long Term Control Plan has been approved, as required by the Administrative Compliance Order. Milestones are contained in the 2017 NPDES permit. MSANK met the first requirement by submitting the Water Quality Management permit application and the Act 537 Sewage Facilities Special Study to the PADEP for the proposed Wastewater Treatment Plant Upgrade Project. The Act 537 Plan letter was submitted to the PADEP on February 25, 2019 and is included in **Attachment 8**.

Attachment 1 –Significant Industrial Users Regulated Under Pretreatment Program

Attachment 1
Municipal Sanitary Authority of the City of New Kensington
Industrial Pretreatment Program

Page 1 of 1

Pretreatment Year 2018
Significant Industrial Users Regulated Under Pretreatment Permits

SIGNIFICANT / MAJOR / CATEGORICAL

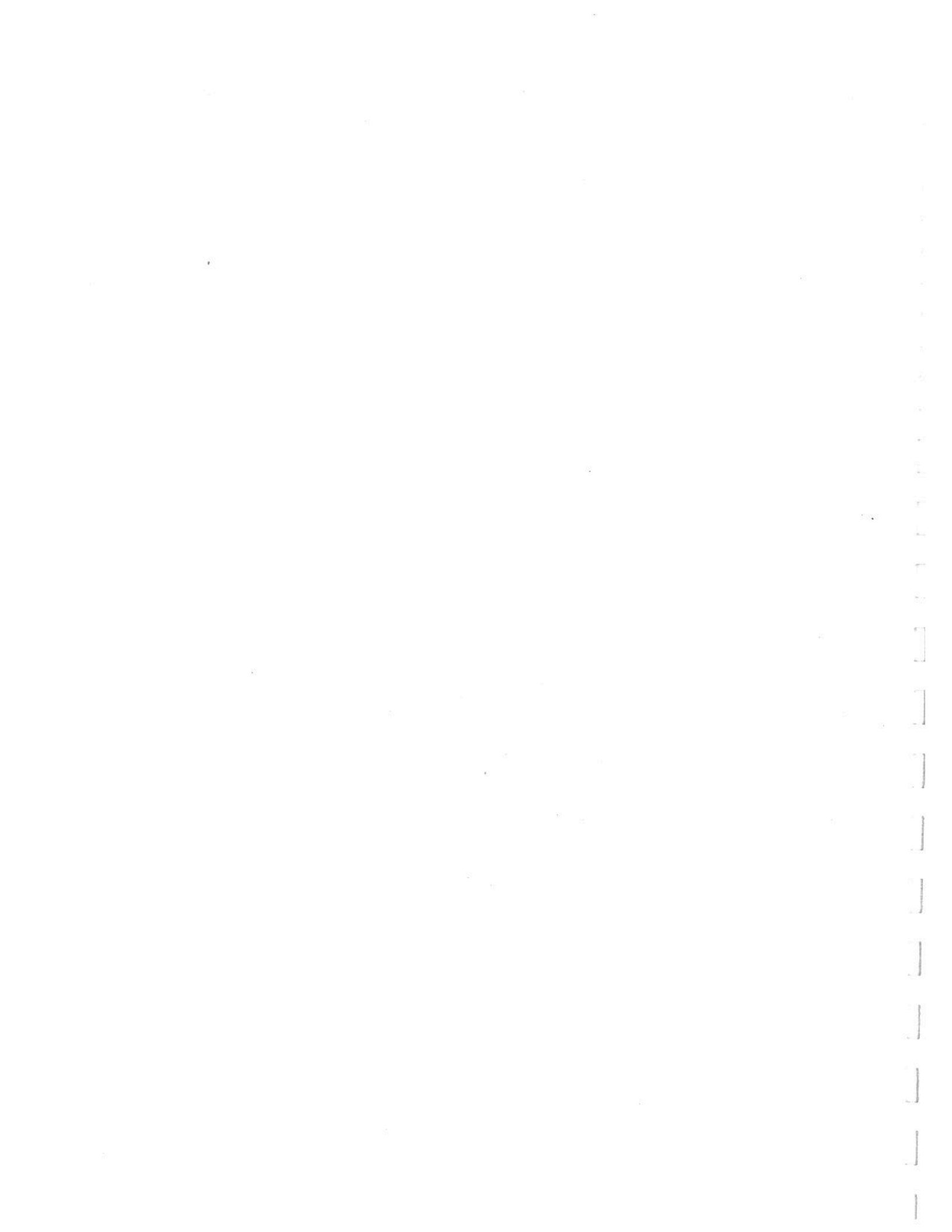
	Name of Industry	SIC Code	Pretreatment Classification	Description of Operations
1	Keystone Rustproofing Inc.	3471	Significant/Major Categorical	Surface Treatments and Protective Coatings for Metal components. Processes include electroplating, anodizing and metallic conversion coatings

SIGNIFICANT / MAJOR / NONCATEGORICAL

2	Smithfield Corporation (Farmland)	2013	Significant/Major Noncategorical	Process raw pork, beef, and turkey into pre-cooked sausage, bacon, and meatballs.
3	Unifirst Corporation	7218	Significant/Major Noncategorical	Uniform rental, servicing and laundering operation

SIGNIFICANT / MINOR / NONCATEGORICAL

4	AVH-Occupational Care Center (Citizens Ambulatory Care Center)	8062	Significant/Minor Noncategorical	outpatient treatment
5	Schreiber Industrial Development Company	9999	Significant/Minor Noncategorical	Managers of an Industrial Park with approximately 24 industries.



Attachment 2 –Significant Industrial User Monitoring Requirements

Attachment 2
Municipal Sanitary Authority of the City of New Kensington
Industrial Pretreatment Program

Page 1 of 2

Pretreatment Year 2018
Monitoring Requirements for Industrial Users Regulated Under Pretreatment Permits

SIGNIFICANT / MAJOR / CATEGORICAL (Discharge Flow >25,000 GPD)

	Name of Industry	Average Daily Flow (GPD)	Required		Schedule of Self Monitoring	Analytical Parameters
			Frequency	Annual Number Scheduled Monitoring		
1	Keystone Rustproofing Inc.	17,500	6	6 Self Monitoring 1 Scheduled Monitoring 1 Unscheduled Monitoring	Bi-Monthly (see Attach. 4 for self monitoring dates)	pH, Cadmium, Chromium, Copper Total Cyanide, Nickel, Lead, Silver Zinc, Total Metals, TTO

SIGNIFICANT / MAJOR / NONCATEGORICAL (Discharge Flow >25,000 GPD)

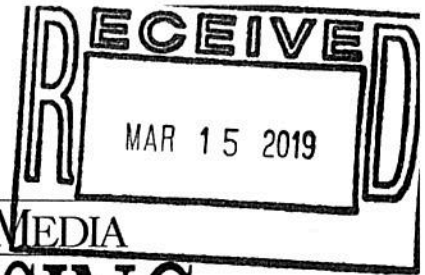
2	Smithfield Corporation (Farmland Foods)	101,000	48	48 Self Monitoring 1 Scheduled Monitoring 1 Unscheduled Monitoring	Weekly (see Attach. 4 for self monitoring dates)	CBOD, pH, Oil and Grease, TSS, Temperature
3	Unifirst Corporation	142,000	48 / 12	48 / 12 Self Monitoring 1 Scheduled Monitoring 1 Unscheduled Monitoring	Weekly / Monthly (see Attach. 4 for self monitoring dates)	pH, Oil and Grease, TSS, Cadmium Chromium, Lead, Nickel, Copper, Zinc, CBOD, Temperature

SIGNIFICANT / MINOR / NONCATEGORICAL (Discharge Flow 15,000 to 25,000 GPD)

Name of Industry		Average Daily Flow Monitoring (GPD)	Annual Frequency	Annual Number of Scheduled Monitoring	Schedule of Self Monitoring	Analytical Parameters
4	AVH-Occupational Care Center (Citizens Ambulatory Care Center)	15,000	4	4 Self Monitoring 1 Scheduled Monitoring 1 Unscheduled Monitoring	Quarterly (see Attach. 4 for self monitoring dates)	pH, CBOD, TSS, Oil and Grease Arsenic, Cadmium, Chromium, Copper Total Cyanide, Lead, Mercury, Nickel Total Phenols, Silver, Zinc, Hexavalent Chromium, TTO, Formaldehyde, Temperature.
5	Schreiber Industrial Development Company	25,000	4	4 Self Monitoring 1 Scheduled Monitoring 1 Unscheduled Monitoring	Quarterly (see Attach. 4 for self monitoring dates)	pH, CBOD, TSS, Oil and Grease, Arsenic Cadmium, Chromium, Copper, T.Cyanide Lead, Mercury, Nickel, T.Phenols, Silver Zinc, Hex. Chromium, Temperature



Attachment 3 – Significant Noncompliance Newspaper Notice



TRIB TOTAL MEDIA LEGAL ADVERTISING

Proof of Publication of Notice in The Valley News Dispatch

Under the Act of July 9, 1976, P.L. 877, No. 160

Commonwealth of Pennsylvania }
County of Allegheny } SS:

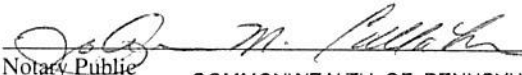
Patty Klingensmith,, Regional Multi-Media Advertising Manager of Trib Total Media, Inc., a corporation of the Commonwealth of Pennsylvania with place of business in Pittsburgh, Allegheny County, Pennsylvania, being duly sworn, deposes and says that the Tribune-Review is a daily newspaper in general circulation in Southwestern Pennsylvania. Said corporation was established in the year 1924. A copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions of the said daily newspaper on the following dates, viz:

LEGAL# 6670764, RE: 2018 ANNUAL REPORT; 13TH DAY OF MARCH, 2019.

Affiant further deposes that s/he is an officer duly Authorized by the Trib Total Media, Inc., publisher of the Tribune-Review, to verify the foregoing statement under oath and also declares that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.


Regional Multi-Media Advertising Manager,
Trib Total Media, Inc.

Sworn to and subscribed before me this
13TH day of MARCH, 2019


Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

JoAnn M. Callahan, Notary Public
City of Greensburg, Westmoreland County
My Commission Expires July 1, 2020

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Statement of Advertising Costs

JOSEPH DITTY
MUNICIPAL SANITARY AUTHORITY
OF THE CITY OF NEW KENSINGTON
120 LOGANS FERRY ROAD
NEW KENSINGTON, PA 15068

To Trib Total Media, Inc..
For Publishing the notice or advertisement attached
hereto on the above stated dates \$147.50
Probating Same \$ 0
Total \$ 147.50

Publisher's Receipt for Advertising Co

The Trib Total Media, Inc., publisher of the Valley News Dispatch acknowledges a receipt of the aforesaid advertising and publication costs, fully paid.

Trib Total Media Inc., Publisher
of the Tribune-Review, a Daily Newspaper.

By _____

LEGAL NOTICE

In accordance with The Environmental Protection Agency's General Pretreatment Regulations, section 403.8 (f) (2) (vii), the following Significant Industrial Users (SIUs) of the Municipal Sanitary Authority of the City of New Kensington (MSANK) Sewage Treatment Plant were in Significant Noncompliance (SNC) with applicable Pretreatment Requirements during 2018:

Keystone Rustproofing, Inc.

Arnold, PA

Schreiber Industrial District
New Kensington, PA

The appropriate enforcement actions have been taken by the Municipal Sanitary Authority of the City of New Kensington in accordance with the Approved Pretreatment Program and Enforcement Response Plan.

Municipal Sanitary Authority
of the City of New Kensington

George Adda

MSANK Chairman

3/12/19

6670764(3-13-19)

Attachment 4 – Testing and Inspection Reports

JANUARY-DECEMBER 2018

IU TEST AND INSPECTION REPORT																	
#	USER	CLASS	PERMIT#	TTO	Mon-Fri	JAN	FEB	MAR	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC
1	AVH-OCC	SMJ	#000020	*	3MO.			12-13T			11-12T			17-18T			17-18T
	MSANK	---	----	*	6MO.											27-28T	19-20T 18 IN
2	Keystone	SMJ	#000040	*	2MO.	9-10T 9-10S	27-28T	26-27T 26-27S	26-27T	30-31S	28-29T	30-31S 30-31T	23-24T 30-31T	20-21S 20-21S	25-26T	29-30T	13-14T
	MSANK	--	--	*	6MO.	9-10S		26-27S		30-31S		30-31S		20-21S		29-30T 30 IN	
3	Sch. Park	SMN	#000400	QTR	QTR.			15-16T		24-25T				20-21T		29-30T	
	MSANK	---	----	*	6MO.												10-11T 19-20T 6 IN
4	Smithfield	SMJ	#000050	NR	2WK.	3-31T	8-28T	8-28T	5-26T	3-31T	4-29T	5-31T	7-28T	4-25T	1-31T	7-28T	5-27T
	MSANK	--	--	NR	6MO.									25-26T			12-13T 18 IN
5	Unifirst	SMJ	#000070	QTR	2WK.	4-31T	5-27T	6-29T	3-24T	1-31T	4-28T	2-27T	2-28T	5-25T	2-30T	5-29T	3-28T
	MSANK	---	----	*	6MO.						25-26T						12-13T 18 IN
LEGEND: T: Testing S: Split Sample IN: Inspection																	

Attachment 5 – NOV and Enforcement Action Reports

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Allegheny Valley Hospital – Outpatient Care Center
William Marshall
651 Fourth Avenue
New Kensington, PA. 15068-5496

May 25, 2018

RE: Pretreatment Program Permit Application

Mr. Marshall:

The enclosed Industrial / Commercial Questionnaire is to be filled out and returned by June 30, 2018.
This questionnaire is considered AVH-OCC permit application for the 2019 Permit.

Your cooperation in this matter is appreciated. If you should have any questions, please contact Joseph Ditty at 724-335-9813 or 724-681-0736.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

cc: File

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:

March 7, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority and Keystone Rustproofing conducted wastewater sample events on January 9-10, 2018 at the discharge of the Keystone Rustproofing pretreatment system. The complete January Lab Report was received on March 2, 2018. Analytical results from this sampling event indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)
1/9-10/18	Nickel	1.260 mg/l	0.220 mg/l
1/9-10/18	Nickel	1.450 mg/l	0.220 mg/l
1/9-10/18	Zinc	4.110 mg/l	1.990 mg/l

Date	Pollutant	Analytical Results (Avg)	Permit Limit (Avg)
1/9-10/18	Zinc	4.110 mg/l	1.690 mg/l
1/9-10/18	Total Metals	6.111 mg/l	1.690 mg/l

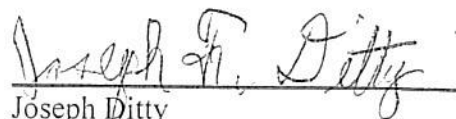
NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



Joseph Ditty

Pretreatment Coordinator

Municipal Sanitary Authority of the
City of New Kensington

120 Logans Ferry Road

New Kensington, PA 15068

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Priority Mail

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

April 2, 2018

Re: **Penalty Notification**

Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that Keystone Rustproofing, Inc. is being assessed a Penalty Pursuant to the Industrial Pretreatment Resolution. The Industrial Pretreatment Resolution as adopted by the Municipal Sanitary Authority of the City Of New Kensington, requires The Municipal Sanitary Authority of The City of New Kensington to enforce Civil Penalties for any violations of the Industrial Pretreatment Program. This penalty is due to:

1. Nickel and Total Cyanide (SNC) Fine Limit Exceedences on August 31, 2017.
2. Nickel, Zinc, Total Cyanide and Total Metals SNC Fine Limit Exceedences on September 7-8, 2017.
3. Copper, Nickel (SNC) and Total Cyanide (SNC) Fine Limit Exceedences on October 18-19, 2017.
4. Nickel, Zinc and Total Cyanide SNC Fine Limit Exceedences on November 7-8, 2017.
5. Nickel and Zinc SNC Fine Limit Exceedences on November 15-16, 2017.
6. Zinc SNC Average Fine Limit Exceedence on November 7-16, 2017.

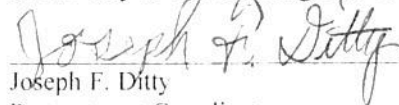
This Penalty has been established in accordance with the Publicly Owned Treatment Works Penalty Law Act No.9 of 1992, 35 P.S. Section 752.1 ET. SEQ. and Federal Regulations 40 CFR Section 403.8 (f) (2) (vii). **The Total Penalty Amount is \$90,000.00 as shown in the MSANK Pretreatment Minimum Fine Schedule Minimum that is attached.**

Users have the right to appeal this Penalty within Thirty (30) Days from the date of receipt hereof to the Court of Common Pleas having Jurisdiction as is provided for under Section 7 (b) of The Publicly Owned Treatment Works Penalty Law, The Local Agency Law, 2 PA.C.S.A. 101 ET. SEQ., and Judicial Code, 42 PA. C.S.A. S762.

Questions can be addressed to my attention at the above address and phone number.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA



Joseph F. Ditty
Pretreatment Coordinator

Enclosures: Minimum Fine Schedule
Cc: Mott Macdonald, Solicitor, File

Parameter Violation: Exceedance of Local and/or Federal Pretreatment Permit Limits (August 2017 through November 2017)

TOTAL FINE

- (A) The minimum fine of \$1,000 shall be doubled for each unpermitted discharge following the initial notification of the first violation
- (B) The parameter exceedance shall be defined as any parameter which exceeds the permit limit as reported.

The fine amount for each parameter exceeded shall be determined by multiplying the amount shown on the fine schedule by the multiplier corresponding to the percent of exceedances as shown below:

Permit Exceedance In Percent	Fine Amount Multiplier
0-25	1
25-50	2
50-75	3
75-100	4
100-125	5
125-150	6
150-175	7
175-200	8
200-225	9
225+	10

- (C) The \$1,000 fine shall be imposed on any parameter which meet the criteria of significant noncompliance which is defined as any parameter which meets one of the following criteria:

- 1-Chronic Violation -Sixty six percent (66%) or more of all the measurements taken during a six month period exceed by any magnitude, the daily maximum limit or the average limit for the same parameter.
- 2-Technical Review Criteria-(TRC)-Thirty three percent (33%) or more of all of the measurements for each pollutant parameter taken during a six month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, Oil and Grease, and 1.2 for all other pollutants except pH.)

- (D) The use shall be fined for reoccurring violations of until the criteria for significant noncompliance is met.

The user shall not be fined for both violations

- (E) The user must be notified by the pretreatment coordinator in writing within 15 days after the report due date before the fine can be assessed.

- (F) The minimum fine of \$1,000 shall be doubled for each day the violation date is exceeded.

- (G) The \$1,000 fine shall be assessed for each parameter that is not monitored correctly.

- (H) The minimum fine of \$1,000 shall be assessed for each violation after the initial violation within the calendar year.

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:

April 2, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit. Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. Keystone Rustproofing conducted wastewater sample events on February 27-28, 2018 at the discharge of the Keystone Rustproofing pretreatment system. Analytical results from these sampling events indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)
2/27-28/18	Nickel	0.343 mg/l	0.220 mg/l
2/27-28/18	Total Cyanide	0.167 mg/l	0.120 mg/l

NOTICE OF VIOLATION

NOTICE

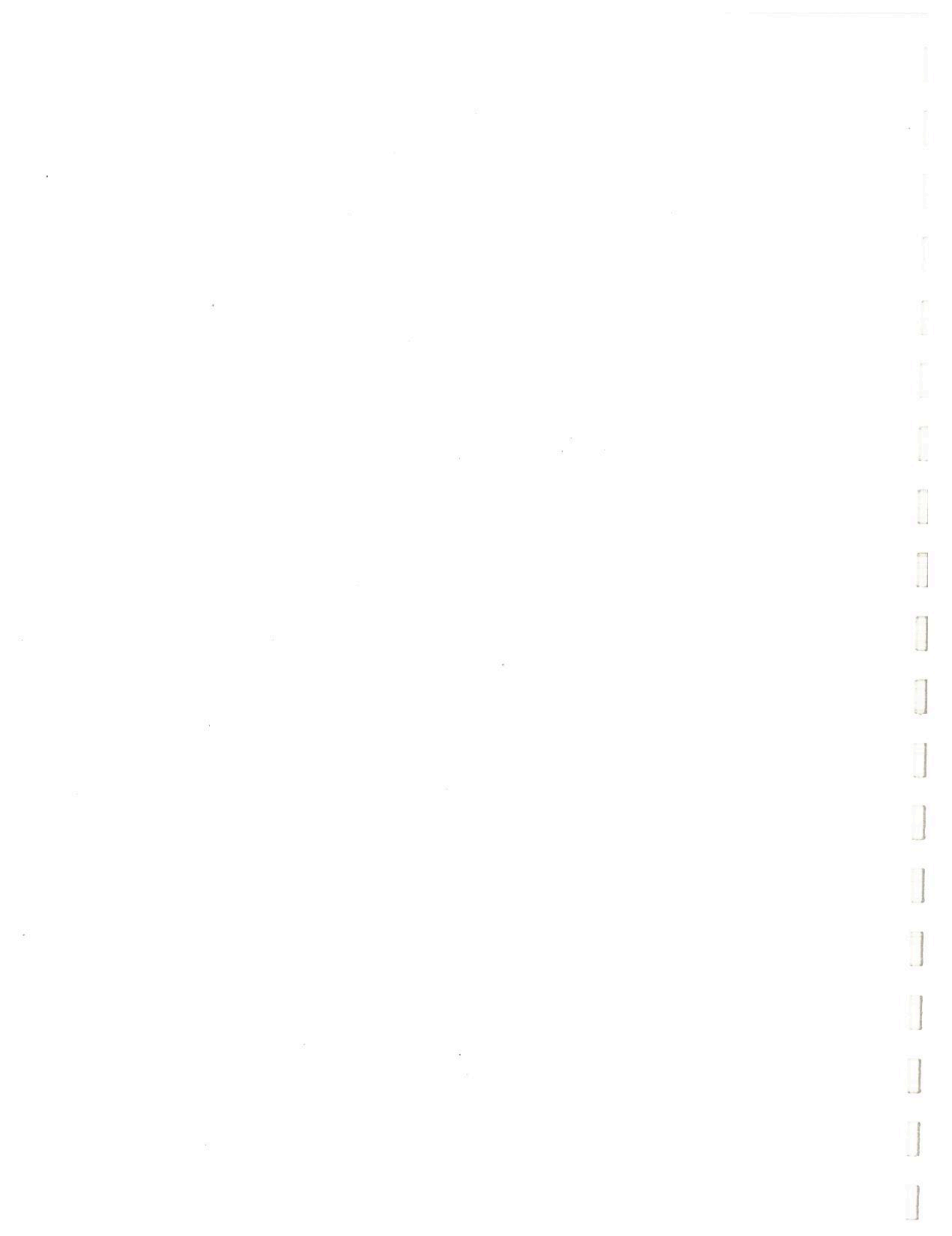
THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed: _____


Joseph Ditty

Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:

May 14, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit. Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority and Keystone Rustproofing conducted wastewater sample events on March 26-27, 2018 at the discharge of the Keystone Rustproofing pretreatment system. Analytical results from these sampling events indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)	Permit Limit (Avg)
3/26-27/18	Nickel	0.425 mg/l	0.220 mg/l	--
3/26-27/18	Zinc	2.095 mg/l	1.990 mg/l	--
3/26-27/18	Zinc	1.882 mg/l	--	1.690 mg/l

NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Priority Mail

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

May 24, 2018

Re: Penalty Notification

Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that the Keystone Rustproofing, Inc. Penalty issued on April 2, 2018 has been reduced. The Industrial Pretreatment Resolution as adopted by the Municipal Sanitary Authority of the City Of New Kensington, requires The Municipal Sanitary Authority of The City of New Kensington to enforce Civil Penalties for any violations of the Industrial Pretreatment Program. This penalty is due to:

1. Nickel and Total Cyanide (SNC) Fine Limit Exceedences on August 31, 2017.
2. Nickel (SNC), Zinc (SNC), Total Cyanide (SNC) and Total Metals Fine Limit Exceedences on September 7-8, 2017.
3. Copper, Nickel (SNC) and Total Cyanide (SNC) Fine Limit Exceedences on October 18-19, 2017.
4. Nickel (SNC), Zinc (SNC) and Total Cyanide (SNC) Fine Limit Exceedences on November 7-8, 2017.
5. Nickel (SNC) and Zinc Fine Limit Exceedences on November 15-16, 2017.
6. Zinc SNC Average Fine Limit Exceedence on November 7-16, 2017.

This Penalty has been established in accordance with the Publicly Owned Treatment Works Penalty Law Act No.9 of 1992, 35 P.S. Section 752.1 ET. SEQ. and Federal Regulations 40 CFR Section 403.8 (f) (2) (vii). **The Total Penalty Amount of \$90,000.00 has been reduced to \$12,000.00 as negotiated on May 2, 2018 and approved at the May 21, 2018 MSANK Board meeting. This fine is to be paid in twelve (12) monthly payments of \$1000.00 beginning June 1, 2018.**

Questions can be addressed to my attention at the above address and phone number.

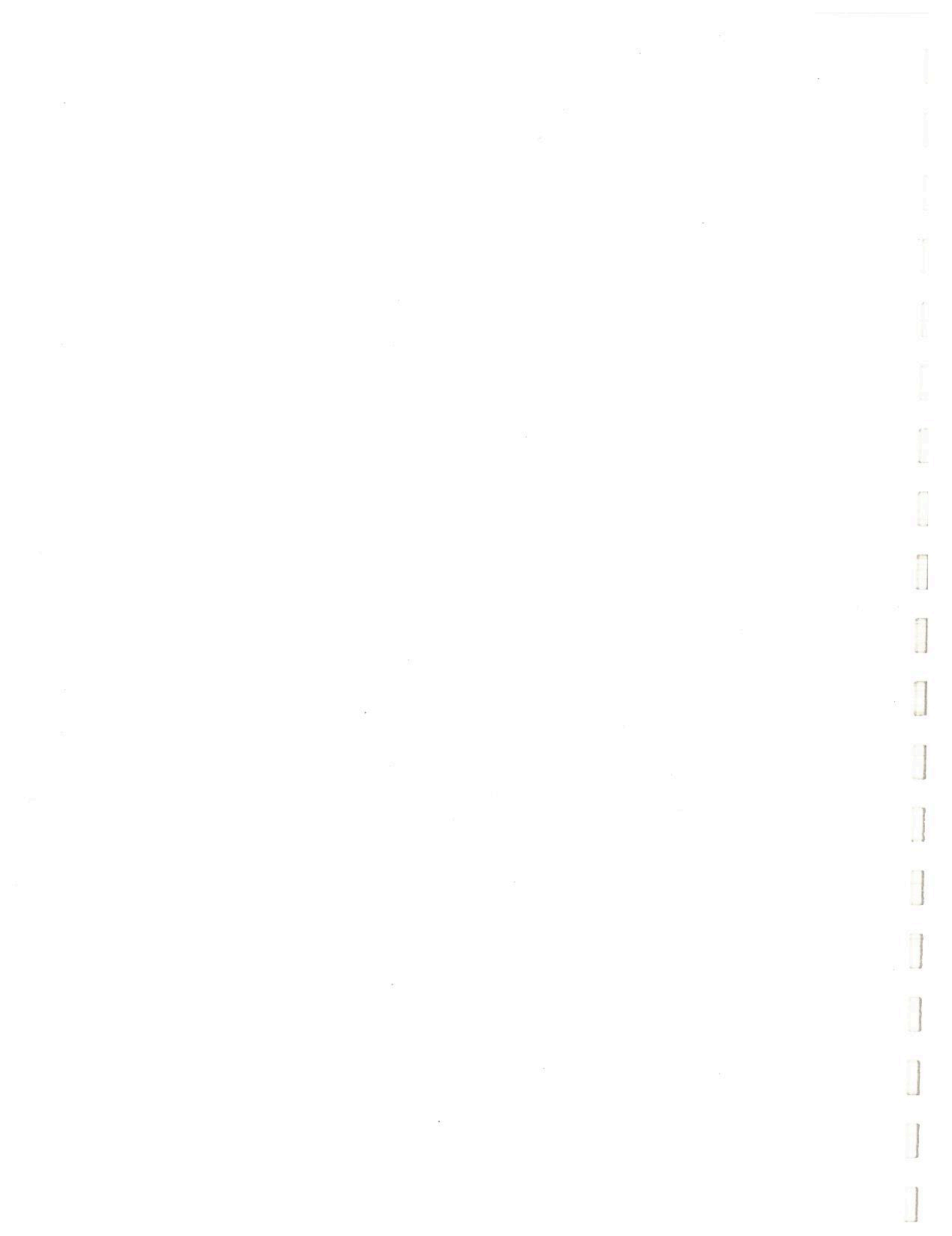
Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA



Joseph F. Ditty
Pretreatment Coordinator

Enclosure: Penalty Invoice
Cc: Mott Macdonald, Solicitor. File



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Keystone Rustproofing, Inc.
Mr. Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

May 30, 2018

RE: Pretreatment Program Permit Application

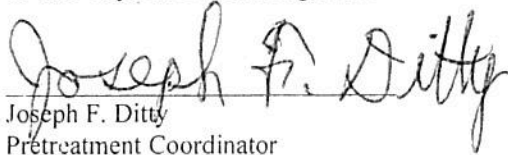
Mr. Gunsallus:

The enclosed Industrial / Commercial Questionnaire is to be filled out and returned by June 30, 2018.
This questionnaire is considered the Keystone Rustproofing permit application for the 2019 Permit.
It is important to provide updated process flow information to determine if any changes will need to be made to the combined waste stream formula limits.

Your cooperation in this matter is appreciated. If you should have any questions, please contact Joseph Ditty at 724-335-9813 or 724-681-0736.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

cc: File

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:

June 11, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit. Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. Keystone Rustproofing conducted a wastewater sample event on April 26-27, 2018 at the discharge of the Keystone Rustproofing pretreatment system. Analytical results from this sampling event indicated an exceedence of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)	Permit Limit (Avg)
4/26-27/18	Nickel	0.318 mg/l	0.220 mg/l	--

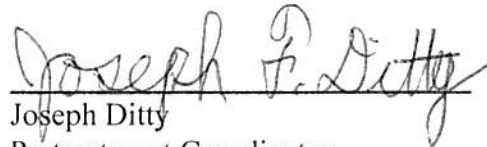
NOTICE OF VIOLATION

NOTICE

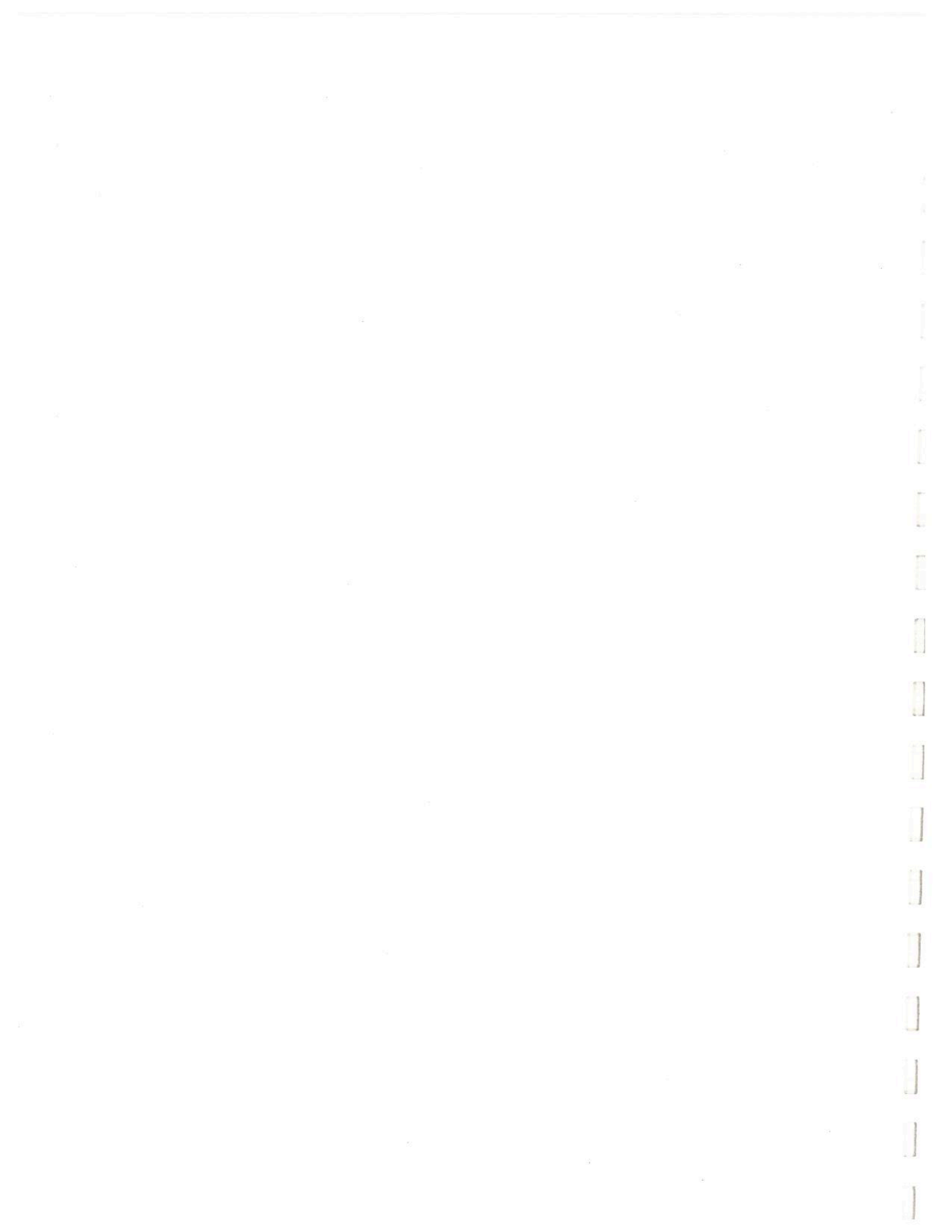
THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

July 18, 2018

Re: Penalty Assessment
Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that Keystone Rustproofing is being considered for a potential \$46,000.00 Penalty (Fine Range: \$1000.00-\$56,000.00) by The Municipal Sanitary Authority at its August 20, 2018 meeting at 7:00 PM. This meeting may be attended by your company's representatives, who can comment on this matter. This penalty is due to:

Parameter	Date	Analysis	Fine Limit (Max)	Fine Limit (Avg)
Nickel	2/27-28/18	0.343 mg/l	0.220 mg/l	--
Total Cyande	2/27-28/18	0.167 mg/l	0.120 mg/l	--
Nickel	3/26-27/18	0.425 mg/l	0.220 mg/l	--
Zinc	3/26-27/18	2.095 mg/l	1.990 mg/l	--
Zinc	3/1-31/18	1.882 mg/l	--	1.690 mg/l
Nickel	4/26-27/18	0.318 mg/l	0.220 mg/l	--

This is considered a violation under the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution, and in accordance with the Federal Regulations found in 40 CFR 403.1, Et Seq.

We will continue to check your Self-Monitoring Reports to determine compliance and what, if any further actions are to be taken. Should you require any further information, please contact me at our office.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

Enclosure: MSANK NOV Letters
cc: Mott MacDonald, Solicitor, File

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:
July 26, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit. Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority and Keystone Rustproofing conducted wastewater sample events on May 30-31, 2018 at the discharge of the Keystone Rustproofing pretreatment system. The complete analysis was received on July 13, 2018. Analytical results from this sampling event indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)
5/30-31/18	Copper	1.249 mg/l	0.690 mg/l
5/30-31/18	Nickel	0.900 mg/l	0.220 mg/l
5/30-31/18	Silver	0.571 mg/l	0.560 mg/l
5/30-31/18	Total Cyanide	3.288 mg/l	0.120 mg/l

(Continued)



<u>Date</u>	<u>Pollutant</u>	<u>Analytical Results (Avg)</u>	<u>Permit Limit (Avg)</u>
5/1-31/18	Silver	0.571 mg/l	0.310 mg/l
5/1-31/18	Total Cyanide	3.288 mg/l	0.530 mg/l

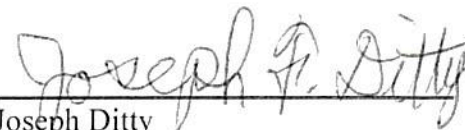
NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068

KEYSTONE RUSTPROOFING

1901 DR. THOMAS BLVD.

ARNOLD, PA 15068

PHONE: 724-339-7588

August 23, 2018

Mr. Daniel H. Rowe, Jr., Manager
Municipal Sanitary Authority of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068

Re: Notice of Violation
July 26, 2018

Dear Mr. Rowe:

This letter is Keystone's response to the NOV dated July 26, 2018. Keystone did have a high nickel result at the end of May, about twice what had been seen in prior months. By letter of July 12 Keystone notified the authority it had decided to install an ion exchange resin system on the nickel rinse and recirculate the nickel rinse waters without discharge to MSANK to solve the nickel discharge problems. The system was installed last week, Keystone will sample today and next week and should have some results showing the impact of the additional treatment and removal of the nickel rinse wastewater from the discharge by September 12.

Keystone believes the silver analytical result shown in the July 26 letter for May 31, 2018 is not correct. Our results show 0.0767 which is in compliance with limits.

Keystone contends the alleged copper violation is the result of an illegally low daily maximum permit limit, which is lower than the federal secondary daily water limit, as well as the about 30% of the permit limit for copper.

We hope the Authority will consider Keystone's response to the NOV and alleged violations. The nickel discharge should be addressed, and the UF membrane replacement is still scheduled for the week of September 20, 2018.

We have not heard back on a date to meet with the Authority to discuss the permit analysis we transmitted to the Authority on July 12, 2018. Kindly advise when you are available to discuss Mr. Amendola's analysis.



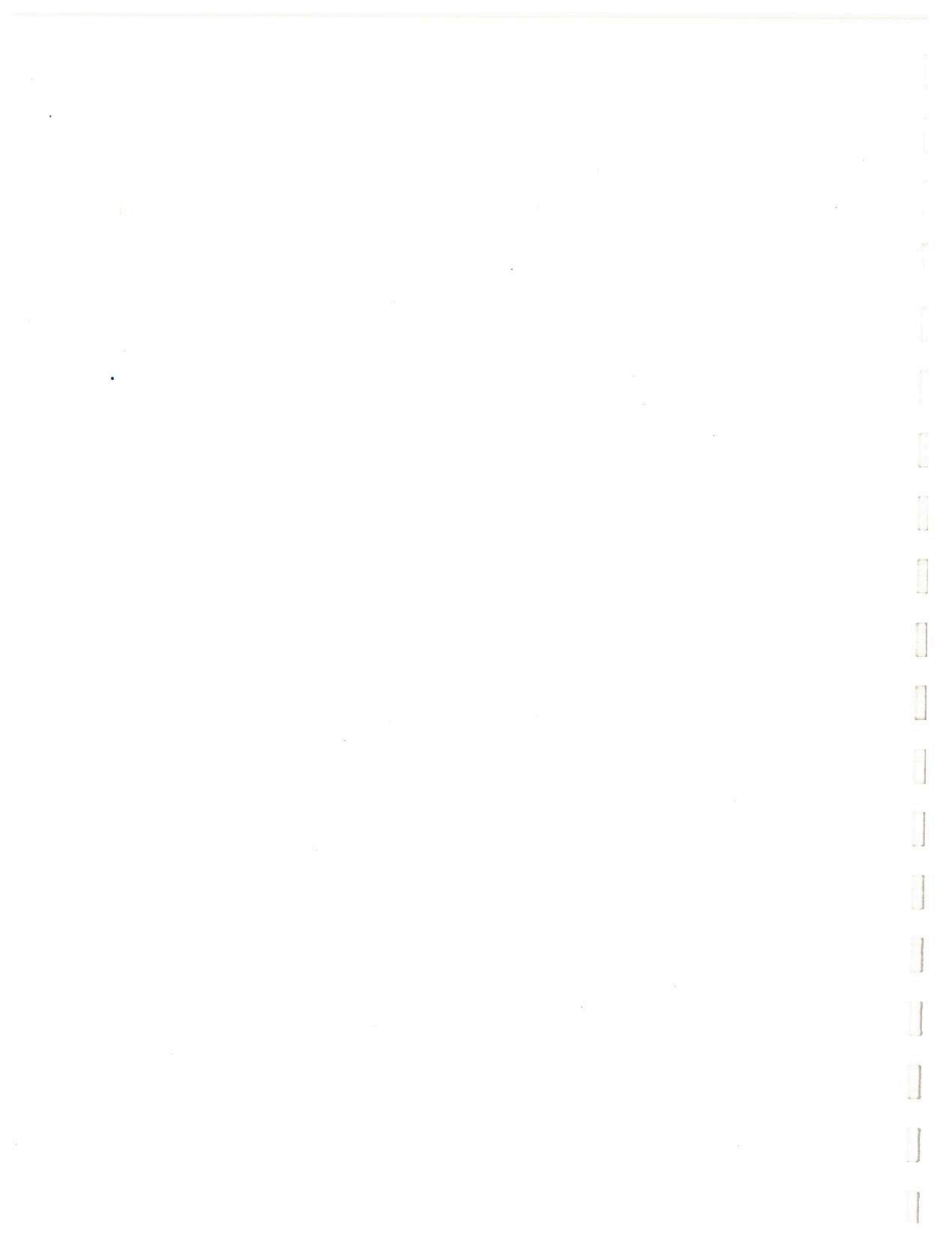
D Rowe
August 23, 2018
Page 2

Very truly yours,

A handwritten signature in cursive script, appearing to read "Larry Vogel".

Larry Vogel, Plant Manager

cc: H. Klodowski, Esquire



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Keystone Rustproofing, Inc.
Mr. Paul Gunsallus
1901 Dr. Thomas Blvd.
Arnold, Pa. 15068

August 28, 2018

Re: May 2018 Revised NOV
Permit # SMJ-000040

Mr. Gunsallus:

I have reviewed the May 2018 Keystone Rustproofing NOV issued July 26, 2018. Following my review I am issuing a revised NOV. As your response has indicated, the silver concentration was found to be off by a decimal point (0.0571 mg/l) and is not exceeding your limits (0.560 mg/l / 0.310 mg/l). This typographical error was unintended, and the purpose of the re-issuance is to correct the NOV. Further, upon re-examining the data, I noted that the copper concentration is actually 1.823 mg/l, which is in exceedence of the limit.

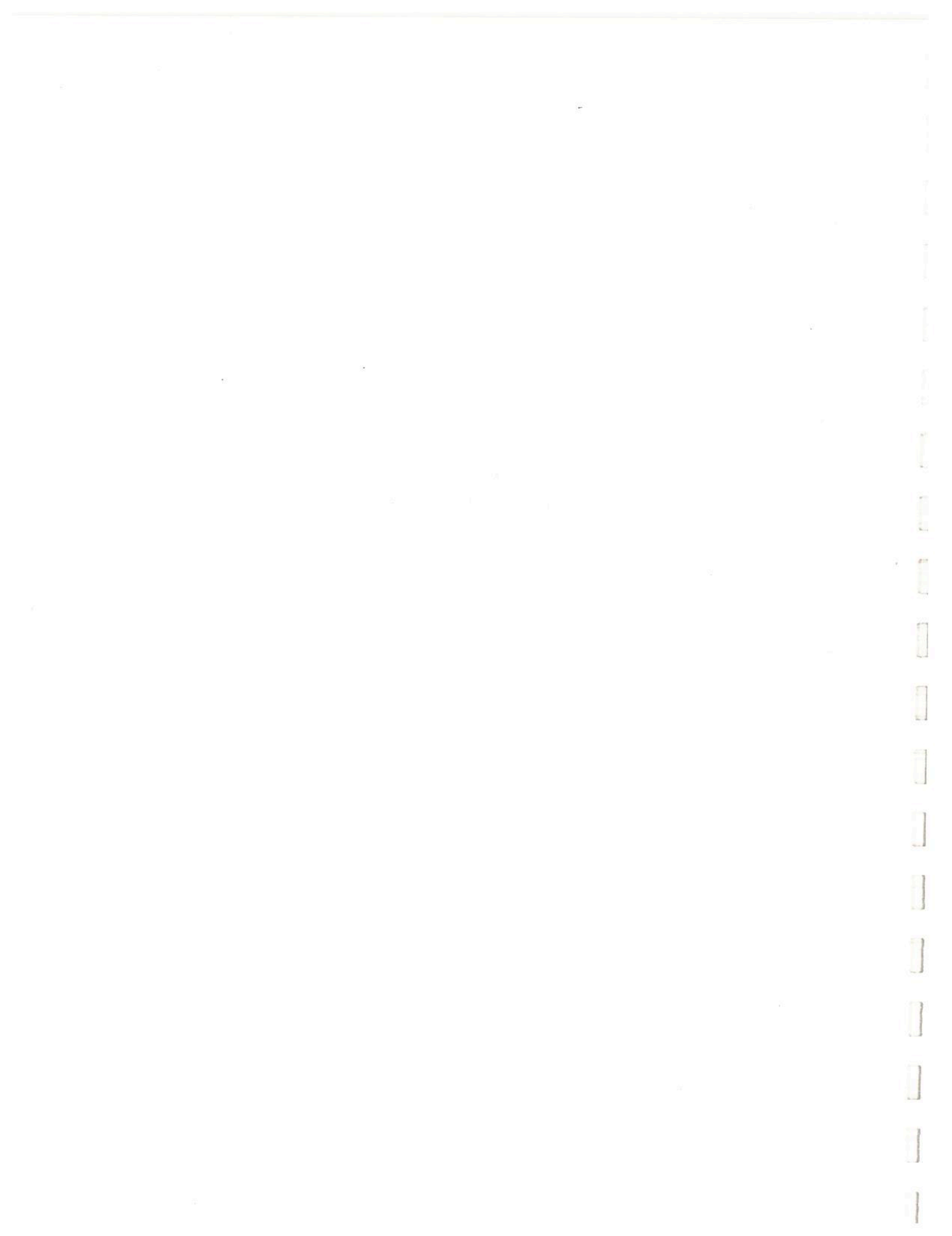
We will continue to monitor your Self-Monitoring Reports to determine compliance. Should you require any further clarity on the issues raised in the May 2018 NOV, please contact me at our office.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

Enclosures: Revised NOV Report
Cc: Mott MacDonald, Solicitor, File



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION

ISSUANCE DATE:

July 26, 2018

REISSUANCE DATE:

August 28, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority and Keystone Rustproofing conducted wastewater sample events on May 30-31, 2018 at the discharge of the Keystone Rustproofing pretreatment system. The complete analysis was received on July 13, 2018. Analytical results from this sampling event indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)
5/30-31/18	Copper	1.823 mg/l	0.690 mg/l
5/30-31/18	Nickel	0.900 mg/l	0.220 mg/l
5/30-31/18	Total Cyanide	3.288 mg/l	0.120 mg/l

Date	Pollutant	Analytical Results(Avg)	Permit Limit(Avg)
5/1-31/18	Total Cyanide	3.288 mg/l	0.530 mg/l



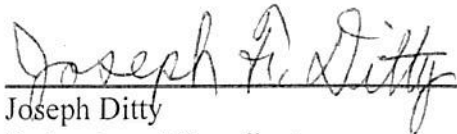
NOTICE OF VIOLATION

NOTICE

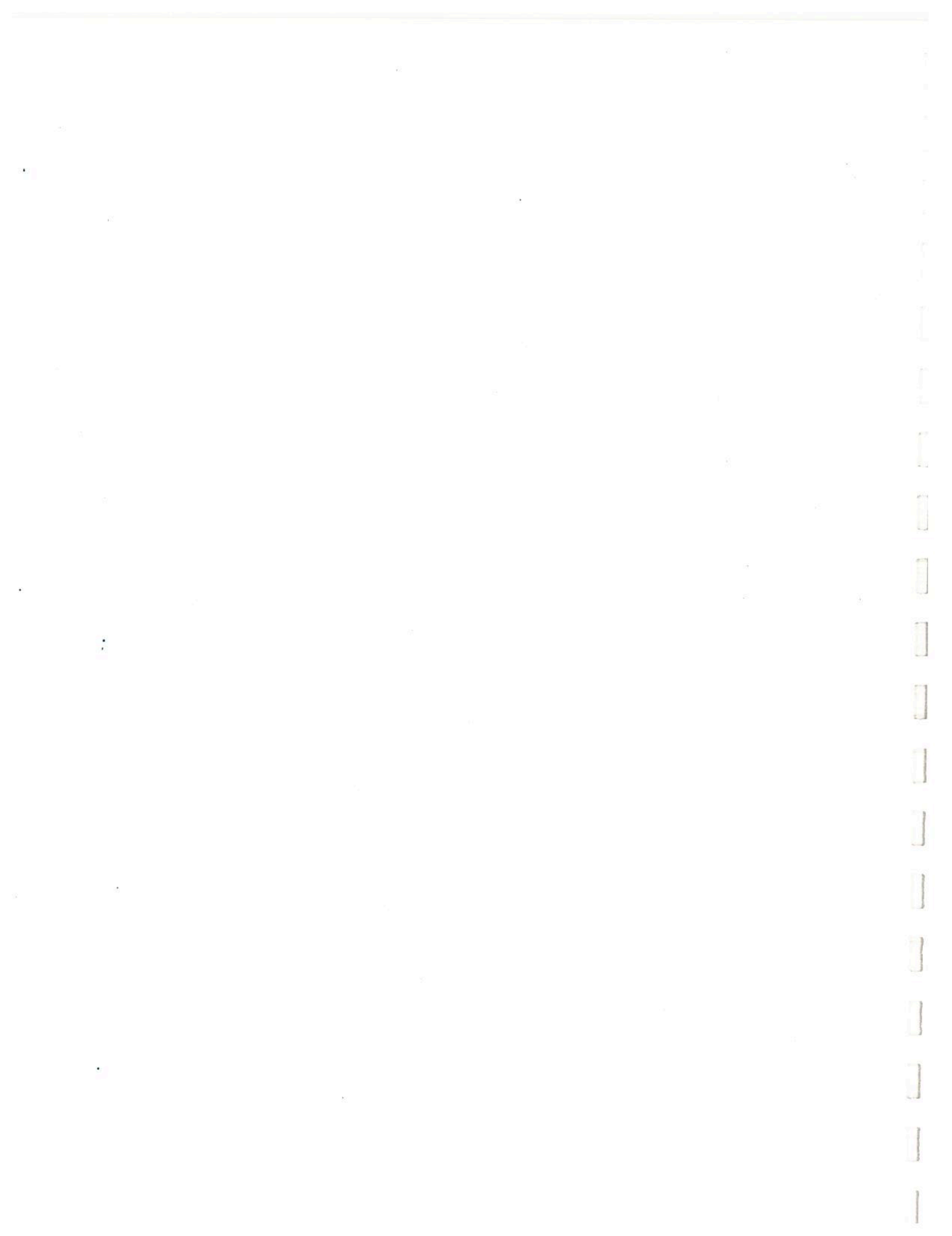
THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:


Joseph Ditty

Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

September 11, 2018

Re: Penalty Assessment
Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that Keystone Rustproofing is being considered for a potential \$46,000.00 Penalty (Fine Range: \$1000.00-\$56,000.00) by The Municipal Sanitary Authority at its September 17, 2018 meeting at 7:00 PM. This meeting may be attended by your company's representatives, who can comment on this matter. This penalty is due to:

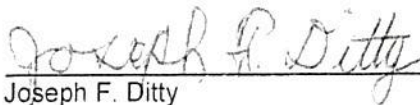
Parameter	Date	Analysis	Fine Limit (Max)	Fine Limit (Avg)
Nickel	2/27-28/18	0.343 mg/l	0.220 mg/l	--
Total Cyande	2/27-28/18	0.167 mg/l	0.120 mg/l	--
Nickel	3/26-27/18	0.425 mg/l	0.220 mg/l	--
Zinc	3/26-27/18	2.095 mg/l	1.990 mg/l	--
Zinc	3/1-31/18	1.882 mg/l	--	1.690 mg/l
Nickel	4/26-27/18	0.318 mg/l	0.220 mg/l	--

This is considered a violation under the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution, and in accordance with the Federal Regulations found in 40 CFR 403.1, Et Seq.

We will continue to check your Self-Monitoring Reports to determine compliance and what, if any further actions are to be taken. Should you require any further information, please contact me at our office.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

Enclosure: MSANK NOV Letters
cc: Mott MacDonald, Solicitor, File

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:
October 19, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority and Keystone Rustproofing conducted wastewater sample events on July 30-31, 2018 at the discharge of the Keystone Rustproofing pretreatment system. The complete analysis was received on September 14, 2018. Analytical results from this sampling event indicated exceedences of Permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max)
7/30-31/18	Copper	2.460 mg/l	0.690 mg/l
7/30-31/18	Nickel	0.550 mg/l	0.220 mg/l

Date	Pollutant	Analytical Results(Avg)	Permit Limit (Avg)
7/1-31/18	Copper	2.460 mg/l	1.890 mg/l

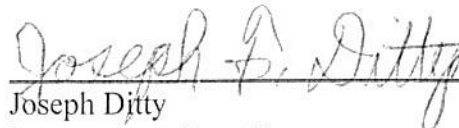
NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



Joseph Ditty

Pretreatment Coordinator

Municipal Sanitary Authority of the
City of New Kensington

120 Logans Ferry Road

New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION

ISSUANCE DATE:

October 19, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Self-Monitoring Report chain of custodies for August 31, 2018 and September 7, 2018 had line 2 received by signature, date and time information missing.
6. Keystone Rustproofing conducted wastewater sample events on August 23-24, 30-31, 2018 at the discharge of the Keystone Rustproofing pretreatment system. The Self-Monitoring Report was received on September 28, 2018. Analytical results from this sampling event indicated exceedences of Permit limits as follows:

<u>Date</u>	<u>Pollutant</u>	<u>Analytical Results</u>	<u>Permit Limit (Max)</u>
8/30-31/18	Total Cyanide	0.210 mg/l	0.120 mg/l

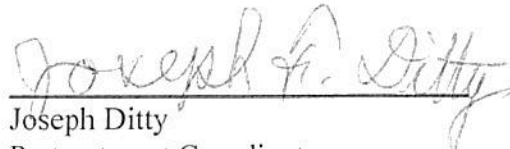
NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:



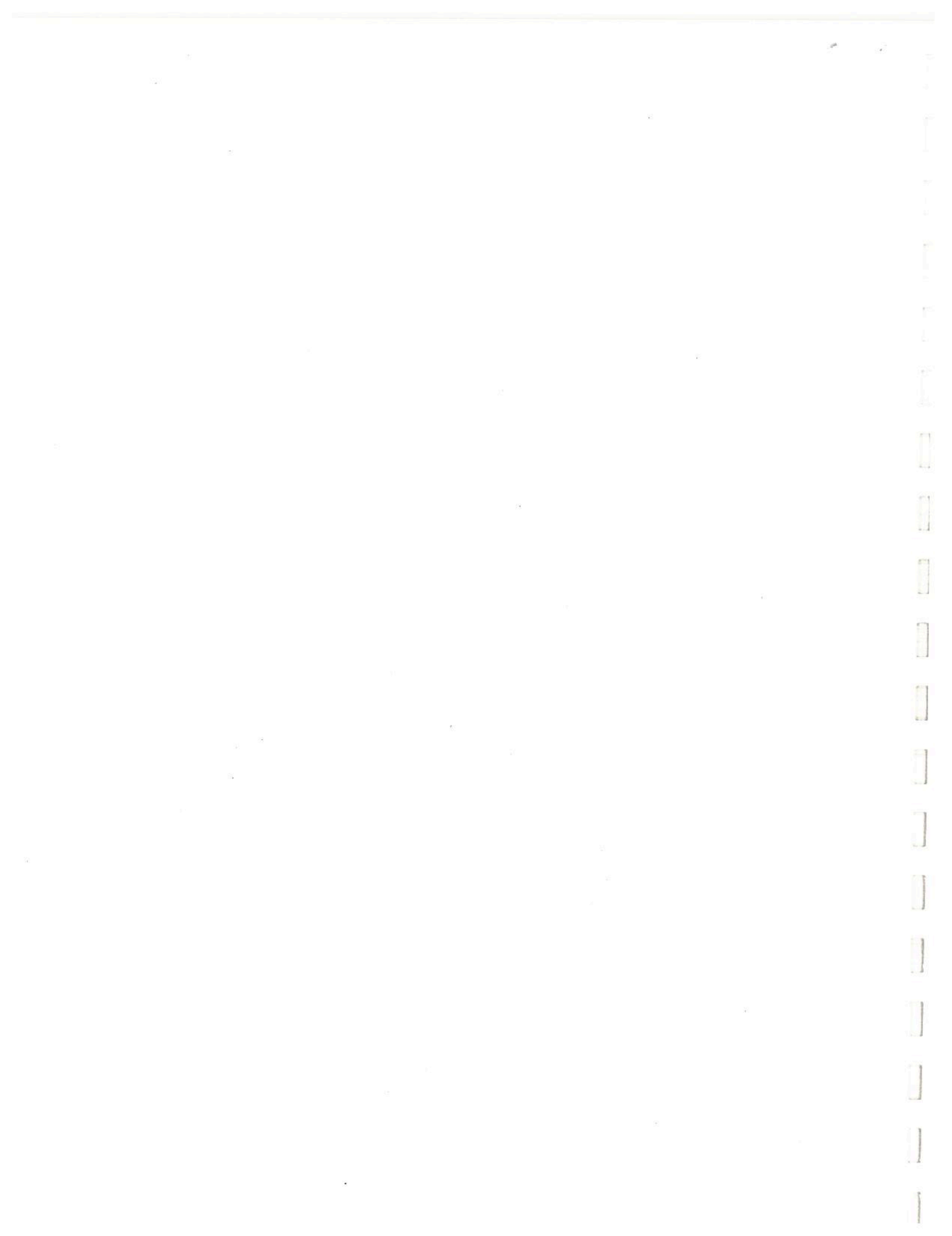
Joseph Ditty

Pretreatment Coordinator

Municipal Sanitary Authority of the
City of New Kensington

120 Logans Ferry Road

New Kensington, PA 15068



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF

KEYSTONE RUSTPROOFING, INC.
1901 Dr. Thomas Blvd.
Arnold, PA 15068

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NOTICE OF VIOLATION
ISSUANCE DATE:
November 7, 2018

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.
3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.
4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.
5. The Municipal Sanitary Authority conducted a wastewater sample event on September 20-21, 2018 at the Keystone Rustproofing permitted discharge, which was split with Keystone (results received on October 23, 2018 were averaged). Test results from this sampling event indicated exceedences of permit limits as follows:

Date	Pollutant	Analytical Results	Permit Limit (Max/TRC)
9/20-21/18	Copper	3.060 mg/l	0.690 mg/l / 0.828 mg/l
9/20-21/18	Nickel	2.105 mg/l	0.220 mg/l / 0.264 mg/l
9/20-21/18	Total Cyanide	4.088 mg/l	0.120 mg/l / 0.144 mg/l
9/20-21/18	Zinc	39.300 mg/l	1.990 mg/l / 2.388 mg/l
9/20-21/18	Total Metals	45.000 mg/l	10.500 mg/l / 12.600 mg/l

(Continued)

<u>Date</u>	<u>Pollutant</u>	<u>Analytical Results</u>	<u>Permit Limit (Avg./TRC)</u>
9/1-30/18	Copper	3.060 mg/l	1.890 mg/l / 2.268 mg/l
9/1-30/18	Nickel	2.105 mg/l	1.990 mg/l / 2.388 mg/l
9/1-30/18	Total Cyanide	4.088 mg/l	0.530 mg/l / 0.636 mg/l
9/1-30/18	Zinc	39.300 mg/l	1.690 mg/l / 2.028 mg/l
9/1-30/18	Total Metals	45.000 mg/l	5.000 mg/l / 6.000 mg/l

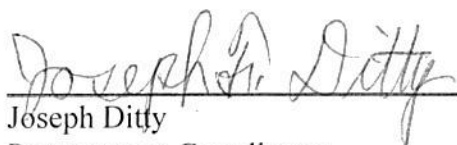
NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.
2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed:


Joseph Ditty

Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Priority Mail

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

November 20, 2018

Re: Penalty Notification

Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that Keystone Rustproofing, Inc. is being assessed a Penalty Pursuant to the Industrial Pretreatment Resolution. The Industrial Pretreatment Resolution as adopted by the Municipal Sanitary Authority of the City Of New Kensington, requires The Municipal Sanitary Authority of The City of New Kensington to enforce Civil Penalties for any violations of the Industrial Pretreatment Program. This penalty is due to:

1. Nickel and Total Cyanide (SNC) Fine Limit Exceedences on February 27-28, 2018.
2. Nickel (SNC) and Zinc Fine Limit Exceedences on March 26-27, 2018.
3. Zinc Average Fine Limit Exceedence for March 1-31, 2018
4. Nickel SNC Fine Limit Exceedence on April 26-27, 2018.

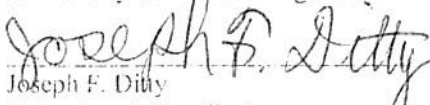
This Penalty has been established in accordance with the Publicly Owned Treatment Works Penalty Law Act No.9 of 1992, 35 P.S. Section 752.1 ET. SEQ. and Federal Regulations 40 CFR Section 403.8 (f) (2) (vii). **The Total Penalty Amount is \$46,000.00 as shown in the MSANK Pretreatment Minimum Fine Schedule Minimum that is attached.**

Users have the right to appeal this Penalty within Thirty (30) Days from the date of receipt hereof to the Court of Common Pleas having Jurisdiction as is provided for under Section 7 (b) of The Publicly Owned Treatment Works Penalty Law, The Local Agency Law, 2 PA.C.S.A. 101 ET. SEQ., and Judicial Code, 42 PA. C.S.A. §762.

Questions can be addressed to my attention at the above address and phone number.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

Enclosures: Minimum Fine Schedule
Cc: Mott Macdonald, Solicitor, File



Parameter Violation: Exceedance of Local and/or Federal Pretreatment Permit Limits (February 2018 through April 2018)

TOTAL FINE

- (A) A fine shall be imposed on any parameter which meets the criteria for significant noncompliance (SNC) per 40 CFR 403.8(f)(2)(viii). An industrial user is in SNC if its violation meets one or more of these criteria, among others listed in 40 CFR 403.8:
- A. Chronic violation of wastewater discharge limits, defined as those in which sixty-six percent (66%) or more of all of the measurements taken during a six month period exceed by any magnitude a numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(i).
 - B. Technical Review Criteria (TRC) violations, defined as those in which thirty three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six month period equal or exceed the product of the numeric pretreatment standard or requirement including instantaneous limits, defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC equals 1.4 for BOD, TSS, Oil and Grease and 1.2 for all other parameters except pH)
 - C. Any other violation of a Pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long term average, instantaneous limit, or narrative standard) that the POTW determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public).
 - D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of 40 CFR 403 to halt or prevent such a discharge;
 - E. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction completing construction or attaining final compliance.
 - F. Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self monitoring reports, and reports on compliance with compliance schedules.
 - G. Failure to accurately report noncompliance.
 - H. Any other violation, or group of violations which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local pretreatment program.

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

Priority Mail

Keystone Rustproofing, Inc.
Paul Gunsallus
1901 Dr. Thomas Boulevard
Arnold, PA. 15068

November 20, 2018

Re: **Penalty Notification**

Pretreatment Permit No. SMJ-000040

Mr. Gunsallus:

This letter serves notice that Keystone Rustproofing, Inc. is being assessed a Penalty Pursuant to the Industrial Pretreatment Resolution. The Industrial Pretreatment Resolution as adopted by the Municipal Sanitary Authority of the City Of New Kensington, requires The Municipal Sanitary Authority of The City of New Kensington to enforce Civil Penalties for any violations of the Industrial Pretreatment Program. This penalty is due to:

1. Copper, Nickel and Total Cyanide (SNC) Fine Limit Exceedences on May 30-31, 2018.
2. Total Cyanide Average (SNC) Fine Limit Exceedence for May 1-31, 2018
3. Copper and Nickel (SNC) Fine Limit Exceedences on July 30-31, 2018.
4. Copper Average (SNC) Fine Limit Exceedence for July 1-31, 2018
5. Total Cyanide (SNC) Fine Limit Exceedence for August 30-31, 2018.

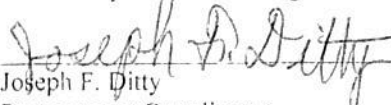
This Penalty has been established in accordance with the Publicly Owned Treatment Works Penalty Law Act No.9 of 1992, 35 P.S. Section 752.1 ET. SEQ. and Federal Regulations 40 CFR Section 403.8 (f) (2) (vii). **The Total Penalty Amount is \$72,000.00 as shown in the MSANK Pretreatment Minimum Fine Schedule Minimum that is attached.**

Users have the right to appeal this Penalty within Thirty (30) Days from the date of receipt hereof to the Court of Common Pleas having Jurisdiction as is provided for under Section 7 (b) of The Publicly Owned Treatment Works Penalty Law, The Local Agency Law, 2 PA.C.S.A. 101 ET. SEQ., and Judicial Code, 42 PA. C.S.A. §762.

Questions can be addressed to my attention at the above address and phone number.

Sincerely,

The Municipal Sanitary Authority
of The City of New Kensington, PA


Joseph F. Ditty
Pretreatment Coordinator

Enclosures: Minimum Fine Schedule
Cc: Mott Macdonald, Solicitor, File

Significant Industrial User: Keystone Rustproofing, Arnold, Pa.
Parameter Violation: Exceedance of Local and/or Federal Pretreatment

[illegible]



(A) A fine shall be imposed on any parameter which meets the criteria for significant noncompliance (SNC) per 40 CFR 403.8(f)(2)(viii).
An industrial user is in SNC if its violation meets one or more of these criteria, among others listed in 40 CFR 403.8:

A. Chronic violation of wastewater discharge limits, defined as those in which sixty-six percent (66%) or more of all of the measurements taken during a six month period exceed by any magnitude a numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l).

B. Technical Review Criteria (TRC) violations, defined as those in which thirty three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six month period equal or exceed the product of the numeric pretreatment standard or requirement including instantaneous limits, defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC equals 1.4 for BOD, TSS, Oil and Grease and 1.2 for all other parameters except pH)

C. Any other violation of a Pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long term average, instantaneous limit, or narrative standard), that the POTW determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public).

D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of 40 CFR 403 to halt or prevent such a discharge;

E. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction completing construction or attaining final compliance.

F. Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self monitoring reports, and reports on compliance with compliance schedules.

G. Failure to accurately report noncompliance.

H. Any other violation, or group of violations which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local pretreatment program.

